

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 robert.freeman@lewisbrisbois.com
E. MATTHEW FREEMAN
3 Nevada Bar No. 14198
matt.freeman@lewisbrisbois.com
4 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
702.893.3383
6 FAX: 702.893.3789
Attorneys for Defendant
7 Corrections Officer Trainee
Raynaldo-John Ramos
8

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 ***

11 VICTOR PEREZ, as Special Administrator of
12 the Estate of CARLOS PEREZ, deceased;
13 VICTOR PEREZ, as the Guardian Ad Litem
14 for S.E.P, a minor; VICTOR PEREZ, as the
Guardian Ad Litem for A.I.P., a minor; and
MYRA PEREZ, individually,

15 Plaintiff,

16 vs.

17 STATE OF NEVADA, DIRECTOR GREG
COX, individually; WARDEN DWIGHT
18 NEVEN, individually; ASSISTANT
WARDER TIMOTHY FILSON, individually;
19 COT RAMOS, individually; LIEUTENANT
OLIVER, individually; CORRECTIONS
20 OFFICER CASTRO, individually;
CORRECTIONS OFFICER SMITH,
21 individually; and DOES I-X, inclusive; and
ROES I-X, inclusive;

22 Defendants.
23

CASE NO. 2:15-cv-1572-APG-DJA

**DEFENDANT CORRECTIONS OFFICER
TRAINEE RAYNALDO-JOHN RAMOS'S
REQUEST FOR EXEMPTION OF
ATTENDANCE REQUIREMENT AT THE
SETTLEMENT CONFERENCE
SCHEDULED FOR FEBRUARY 24, 2023**

24 COMES NOW, Defendant Corrections Officer Trainee RAYNALDO-JOHN RAMOS
25 (hereinafter "Defendant") by and through his counsel, Robert W. Freeman, Esq., and E. Matthew
26 Freeman, Esq., of LEWIS BRISBOIS BISGAARD & SMITH, LLP, and hereby file this Request
27 for Exception of Attendance Requirement at the Settlement Conference scheduled for February
28 24, 2023.

1 This matter was referred for a settlement conference before Judge Daniel J. Albregts. The
2 order requires attendance of the above-referenced defendant, however, he respectfully requests an
3 attendance exception. The exception is based on the following non-exhaustive list of factors:

- 4 • Defendant Corrections Officer Trainee Raynaldo-John Ramos currently resides
5 outside the State of Nevada;
- 6 • Defendant Corrections Officer Trainee Raynaldo-John Ramos will make himself
7 available via telephone to undersigned counsel for the duration of the Settlement
8 Conference.

9 Based upon the above, Defendant Ramos respectfully requests that he be excused from the
10 settlement conference.

11 DATED this 10th day of February, 2023.

12 LEWIS BRISBOIS BISGAARD & SMITH LLP

13 /s/ Robert W. Freeman

14 Robert W. Freeman
15 Nevada Bar No. 3062
16 E. Matthew Freeman
17 Nevada Bar No. 14198
18 6385 S. Rainbow Blvd, Suite 600
19 Las Vegas, Nevada 89118
20 Attorney for Defendant
21 Corrections Trainee Officer
22 Raynaldo-John Ramos
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of February, 2022, I electronically filed the **DEFENDANT CORRECTIONS OFFICER TRAINEE RAYNALDO-JOHN RAMOS'S REQUEST FOR EXEMPTION OF ATTENDANCE REQUIREMENT AT THE SETTLEMENT CONFERENCE SCHEDULED FOR FEBRUARY 24, 2023** with the Clerk of the Court through Case Management/Electronic Filing System.

Paola M. Aremeni, Esq.
Gia N. Marina, Esq.
CLARK HILL PLLC
3800 Howard Hughes Parkway
Suite 500
Las Vegas, Nevada 89169
Attorneys of Plaintiff

Aaron D. Ford, Esq.
Steven G. Shevorski, Esq.
Craig Newby, Esq.
Kiel B. Ireland, Esq.
NEVADA ATTORNEY GENERALS OFFICE
100 N. Carson Street
Carson City, Nevada 89701
Attorneys for Defendants
the State of Nevada
Director James Greg Cox, Warden, Dwight Neven,
Assistant Warden Timothy Filson, Lieutenant Ronald Oliver

Jeffrey F. Barr, Esq.
Alina M. Shell, Esq.
ARMSTRONG TEASDALE LLP
3770 Howard Hughes Parkway
Suite 200
Las Vegas, Nevada 89169
Attorneys for Defendant
Corrections Officer Isaiah Smith

Craig R. Anderson, Esq.
Jackie V. Nichols, Esq.
MARQUIS AURBACH & COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendant
Corrections Officer Castro

/s/ Kristen Freeman
Employee of LEWIS BRISBOIS
BISGAARD & SMITH LLP